

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BOURNEWOOD HOSPITAL, Plaintiffs, - vs - TOMMY G. THOMPSON, SECRETARY, UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES, Defendant.	Civil Action No. 04-10149-JLT
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MOTION TO EXTEND SCHEDULE

Plaintiff Bournewood Hospital, by counsel, and defendant Tommy G. Thompson, Secretary of the Department of Health and Human Services, by counsel, (together, the “Parties”) hereby jointly request that the Court issue a Revised Scheduling Order as set forth below, extending the timeline established in the Court’s Scheduling Order.

The Parties are engaged in settlement negotiations they believe are productive and may resolve the case without need of making some or all of the filings contemplated by the schedule described below.

The Parties propose that the Court issue an order revising the previously ordered briefing and conference schedule as follows:

March 31, 2005:	Plaintiffs’ Motion for Summary Judgment
May 12, 2005:	Defendant’s Opposition/Cross-Motion
June 9, 2005:	Plaintiffs’ Opposition/Reply
July 14, 2005:	Defendant’s Reply
August 16, 2005:	10:00 a.m. Status Conference

For the foregoing reasons, the Parties respectfully request that the Court issue a briefing schedule in the form set forth above.

Dated: January 10, 2005

Respectfully submitted,

/s/ Gina Y. Walcott-Torres
Attorney for Defendant Tommy G.
Thompson, Secretary

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